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Glen Littleton and Class Counsel*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE TESLA, INC. SECURITIES
LITIGATION

Case No. 3:18-cv-04865-EMC

**DECLARATION OF ADAM M. APTON
IN SUPPORT OF PLAINTIFF'S
MOTION FOR ISSUANCE OF A
REQUEST FOR JUDICIAL
ASSISTANCE (LETTERS ROGATORY)**

Date: February 18, 2021
Time: 1:30 p.m.
Location: Courtroom 5, 17th Floor
Judge: Hon. Edward M. Chen

Date Action Filed: August 10, 2018

I, Adam M. Apton, declare as follows:

1. I am attorney at law licensed to practice in State of California, and a partner with the firm Levi & Korsinsky, LLP. I represent Plaintiff Glen Littleton in the above-captioned action. This declaration is submitted in connection with Plaintiff's Motion for Issuance of a Request for Judicial Assistance (Letters Rogatory). I have personal knowledge of the facts set forth in this declaration. If called as a witness, I could and would competently testify thereto.

2. Attached hereto are true and correct copies of the following documents received from the U.S. Securities and Exchange Commission in response to a subpoena for documents:

| Exhibit | Document |
|-----------|---------------------|
| Exhibit A | SEC-EPROD-000016694 |
| Exhibit B | SEC-EPROD-000009477 |

3. The Kingdom of Saudi Arabia's sovereign wealth fund named the "Public Investment Fund" is incorporated and headquartered in Saudi Arabia. It does not maintain any offices within the United States.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 14th day of January 2021.

s/ Adam M. Apton
Adam M. Apton